

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ISOJON KHUSENOV,

Case No.:

Plaintiff,

NOTICE OF REMOVAL

-against-

PROKRAFT INC. and PRO-CUT,

Defendants
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Defendants sued PROKRAFT, INC. And PRO-CUT (hereinafter Collectively "Prokraft"), by and through their attorneys of record, O'Connor Redd Orlando, LLP, hereby remove this action to the United States District Court for the Eastern District of New York pursuant to 28 U.S.C. § 1441(a) on the grounds of diversity under 28 U.S.C § 1332.

1. This action was commenced in the Supreme Court of the State of New York, County of Queens, by the filing of a Summons and Verified Complaint bearing Case No. 712947/2021, on or about June 7, 2021. A true and correct copy of the Summons with Verified Complaint is attached hereto as **Exhibit "A"**.
2. The Summons and Verified Complaint was served on Prokraft on June 9, 2021. Therefore the thirty-day time period for removal provided in 28 U.S.C. 1446(b) has not yet elapsed.
3. This is a civil action by Plaintiff Isojon Khusenov (hereinafter referred to as "Plaintiff") against the defendants seeking damages for personal injuries.
4. This is a civil action over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and is one which may be removed to this Court by Prokraft pursuant to the provisions of 28 U.S.C. § 1441 (b), in that it is a civil action wherein the matter in controversy exceeds the sum or value of \$75,000, exclusive of interests and

costs, and is between “citizens of different States and in which citizens or subjects of a foreign state are additional parties.

5. Plaintiff alleges that he was and still is a resident of the County of Queens, City and State of New York. Complaint ¶ 1.
6. Defendant Prokraft, Inc. is a Foreign Corporation with its principal place of business in Houston, Texas.
7. Defendant Pro-Cut is a Brand name.
8. Accordingly, this action may be removed to this Court pursuant to the provisions of 28 U.S.C. § 1332, as there is complete diversity of citizenship between the plaintiff and all the defendants and the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

WHEREFORE, Defendants Prokraft pray that the above-entitled action now pending in the Supreme Court of New York for the County of Queens, be removed to this Court.

Dated: New York, New York
June 30, 2021

Respectfully Submitted,
O’CONNOR REDD ORLANDO LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Eastern District of New York, using the Court's ECF system, and served by mail the notification of such filing to all counsel of record as follows:

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